

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DONALD J. TRUMP, DONALD J. TRUMP
JR., ERIC TRUMP, IVANKA TRUMP,

and

THE DONALD J. TRUMP REVOCABLE
TRUST, THE TRUMP ORGANIZATION,
INC., TRUMP ORGANZATION LLC, DJT
HOLDINGS LLC, DJT HOLDINGS
MANAGING MEMBER LLC, TRUMP
ACQUISITION LLC, and TRUMP
ACQUISITION, CORP.

Plaintiffs,

- against -

DEUTSCHE BANK AG and CAPITAL ONE
FINANCIAL CORP.,

Defendants.

Docket No. 1:19-cv-03826-ER

**DECLARATION OF PATRICK
STRAWBRIDGE**

1. I am an attorney at the law firm Consovoy McCarthy Park PLLC and counsel for Plaintiffs President Donald J. Trump, Donald J. Trump Jr., Eric Trump, and Ivanka Trump in their personal capacities.

2. I am over the age of 18 and under no mental disability or impairment. I have personal knowledge of the following facts and, if called as a witness, would competently testify to them.

3. Exhibit A is an email that I received on April 22, 2019 from Douglas N. Letter, General Counsel of the U.S. House of Representatives.

4. Exhibit B is a letter that I received on April 17, 2019 from Steven R. Ross and Raphael A. Prober of Akin Gump, outside counsel for Deutsche Bank.

5. Exhibit C is an email that I received on April 22, 2019 from Mr. Ross.

Per 28 U.S.C. §1746, I declare under penalty of perjury that the above is true and correct to the best of my knowledge.

Executed on May 3, 2019.

/s Patrick Strawbridge

Exhibit A

DL

From: **Letter, Douglas** Douglas.Letter@mail.house.gov
Subject: Subpoena email response
Date: April 22, 2019 at 2:06 PM
To: patrick@consovoymccarthy.com, will@consovoymccarthy.com
Cc: Tatelman, Todd Todd.Tatelman@mail.house.gov

Mr. Strawbridge,

I write on behalf of the Committee on Financial Services and the House Permanent Select Committee on Intelligence (“Committees”) in response to your April 19, 2019 email request that the Committees provide you with copies of “any subpoenas from the [Committees] seeking information from any financial institution about my clients.”

Please be advised that your clients are not the recipients of any subpoenas issued by the Committees and, consistent with long-standing practice, the Committees do not provide copies of subpoenas to third parties. Please feel free to direct any and all future inquiries about these matters to my attention and to Deputy General Counsel Todd Tatelman (copied here).

Sincerely,

*Douglas N. Letter
General Counsel
Office of General Counsel
U.S. House of Representatives
219 Cannon House Office Building
Washington, DC 20515
Douglas.Letter@mail.house.gov
(202) 225-9700*

From: Tatelman, Todd
Sent: Monday, April 22, 2019 2:00 PM
To: Letter, Douglas <Douglas.Letter@mail.house.gov>
Subject: Strawbridge email

Exhibit B

Akin Gump

STRAUSS HAUER & FELD LLP

STEVEN R. ROSS

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sross@akingump.com

RAPHAEL A. PROBER

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April 17, 2019

Alan Garten
Executive Vice President and
Chief Legal Officer
The Trump Organization
725 Fifth Avenue
New York, NY 10022

Patrick Strawbridge
Consvoy McCarthy Park PLLC
3033 Wilson Boulevard
Suite 700
Arlington, VA 22201

Dear Messrs. Garten & Strawbridge:

This is to inform you that our client, Deutsche Bank AG (“Deutsche Bank”), has received subpoenas issued by the United States House of Representatives Committee on Financial Services and Permanent Select Committee on Intelligence requiring production of certain records and/or information related to banking activities, including information regarding accounts, financings and related financial information, with respect to:

- Donald J. Trump
- Donald Trump, Jr.
- Ivanka Trump
- Eric Trump
- The Donald J. Trump Revocable Trust
- Trump Organization Inc.
- Trump Organization LLC
- DJT Holdings LLC
- DJT Holdings Managing Member LLC
- Trump Acquisition LLC
- Trump Acquisition Corp.

Akin Gump
STRAUSS HAUER & FELD LLP

Alan Garten
Patrick Strawbridge
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- any other name, alias, code name, code number, or entity used in lieu of any of the individuals or entities named above or members of their immediate family

or any account (including, but not limited to, any money market, securities, or trading account or any loan account or structure) in the name of any of the above-named individuals or entities (or any other name, alias, code name, code number, or entity used in lieu of any of the named individuals or entities) or members of their immediate family, individually or with other parties, as well as any account in which any of the above-named individuals or entities are or were, or have been identified as being, a trustee, settlor or grantor, beneficiary, or beneficial owner, or in which any of the individuals or entities have or have had in any way control over, individually or with others.

These subpoenas extend to relevant records and/or information related to the listed entities' parents, subsidiaries, affiliates, branches, divisions, partnerships, properties, groups, special purpose entities, joint ventures, predecessors, successors, or any other entity in which they have or had a controlling interest, and any current or former employee, officer, director, shareholder, partner, member, consultant, senior manager, manager, senior associate, staff employee, independent contractor, agent, attorney or other representative of the above listed entities.

This letter is intended to provide notice of the subpoenas to the above-referenced parties and entities, including—to the extent applicable—any relevant current or former employees of such entities. The return date of the subpoenas is May 6, 2019. Deutsche Bank is legally obligated to comply with these subpoenas and intends to begin so complying on that date.

Please contact the undersigned with any questions.

Best regards,

Steven R. Ross

Raphael A. Prober

cc: Rudy Giuliani

Exhibit C

SR

From: Ross, Steven sross@AKINGUMP.COM
Subject: RE: Deutsche Bank AG
Date: April 22, 2019 at 3:53 PM
To: Patrick Strawbridge patrick@convoymccarthy.com
Cc: Prober, Raphael rprober@akingump.com, Moyer, Thomas tmoyer@AKINGUMP.COM

Patrick—During our Friday telephone conversation, you asked if we would identify the time period applicable to the information sought by the subpoenas the Bank received from the House Committees on Intelligence and Financial Services. In general, the subpoenas call for the Bank to produce responsive documents regarding your clients from January 1, 2010 through the present, with the exception of any documents related to account applications, opening documents, KYC, due diligence, and closing documents. For these documents the subpoena requires production without any time limitation.

In addition, I had copied Bob Roach of the House Financial Services Committee in an earlier written communication. I have been informed that the proper contact person at that committee should be Jennifer Read.

Steven R. Ross

AKIN GUMP STRAUSS HAUER & FELD LLP

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Fax: +1 202.887.4288 | sross@akingump.com | akingump.com | [Bio](#)

Please note that on May 6, 2019, our address will change to 2001 K Street N.W., Washington, DC 20006